IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF OHIO EASTERN DIVISION

Keith Dedrick,

Case No. 1:18-cv-00536

Plaintiff,

Judge: Solomon Oliver

– vs –

Cuyahoga County, Ohio, et al.,

Defendants.

Notice of Non-Opposition to the Motion to Stay (ECF No. 46) Lately Filed by Defendant Kenneth Mills

Plaintiff Keith Dedrick, by and through counsel, hereby respectfully gives notice that he will not oppose the Motion to Stay (ECF No. 46) lately filed by Defendant Kenneth Mills.

Plaintiff notes for the information of the Court that at the time the subject motion was filed, discovery was ongoing and the parties had both agreed to informally continue certain depositions outside the discovery cutoff, and had agreed to mediation by the United States Magistrate Judge, and that Plaintiff – if permitted – would continue those agreements in place until after a stay.¹

Respectfully submitted,

/s/ Raymond V. Vasvari, Jr.

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¹ Plaintiff does have an interest in the expeditious resolution of his claim, and takes exception to Mills argument (ECF No. 46-1, Memorandum, at 11) that he has tarried in pursuit of his claims. The contention is especially disingenuous in light of the fact that a substantial portion of the delay in the case is attributable to Mills being indicted, and his subsequent months-long efforts to secure private counsel.

and

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Counsel for Plaintiff

- CERTIFICATE OF SERVICE -

The foregoing was filed today, 1 November 2019, via the Court Electronic Filing System. Copies will be served upon counsel of record, and may be obtained through operation of, the CM | ECF System.

Respectfully submitted,

/s/ Raymond V. Vasvari, Jr.

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